

**EXHIBIT 8**

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RICHARD XIA, et al.,

Defendants,

and

JULIA YUE and XI VERFENSTEIN, et al.,

Relief Defendants.

Case No.: 21-cv-5350 (PKC)(RER)

STATE OF NEW YORK )  
                          )  
COUNTY OF QUEENS     )

**AFFIDAVIT OF XI VERFENSTEIN ON BEHALF OF  
PERINI GROUP, INC.**

I, **Xi Verfenstein**, submit this affidavit on behalf of Perini Group, Inc. (“Perini”) in response to this Court’s December 1, 2023 Order relating to the above-captioned action:

1. Perini is not a Defendant in the above-captioned matter.
2. Perini has maintained all responsive documents and communications at the following location(s):

The files maintained in offices:

- *112-21 Northern Blvd site trailer*
- *42-31 Union Street: Sub-cellар level office and 9th floor office*
- *Physical files maintained in offices*
- *Digital files maintained in computers, emails*

Computers:

- *IMac and Macbook laptops in offices*

Mobile devices:

- *Iphones X-12*

Email address:

- *xverfens@racanelliconstructiongroup.com*
- *xverfens@perinigroupinc.com*
- *perinigroupinc@gmail.com*
- *xi.wang@fleetfinancialgroup.com*
- *xi.wang@fleetarchitects.com*

Servers: *N/A*

3. Perini has preserved all responsive documents and communications at the locations, files, computers, mobile devices, and email addresses identified in #2 above, where such documents have been maintained. In order to preserve the referenced documents, no documents were deleted.

4. Perini conducted searches for responsive documents and communications at the locations and files identified in #2 above.

5. Perini conducted searches for responsive documents and communications by using search terms from SEC's documents request questions, date ranges using the same documents request time frames, with no other limitations.

6. All responsive documents are still in the possession of Perini.

7. Xi Verfenstein, Perini's president, undertook the efforts to search for all responsive documents and communications.

*Xi Verfenstein*  
Xi Verfenstein  
Dated: December 22, 2023

Sworn to and subscribed before me  
this \_\_\_\_ day of \_\_\_\_\_, 2023

\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires: \_\_\_\_\_